

**BOBBY JINDAL**  
GOVERNOR



**HAROLD LEGGETT, PH.D.**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

Certified Mail No.

Activity No.: PER20080001  
Agency Interest No. 158683

Mr. Arturo Infanzon  
Vice President  
Liberty Gas Storage, LLC  
101 Ash Street  
San Diego, CA 92101

RE: Part 70 Operating Permit, Liberty Gas Storage LLC - Pelican Compressor Station  
Hackberry, Cameron Parish, Louisiana

Dear Mr. Infanzon:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Permit No.: 0560-00268-V0

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary  
CSN:mv  
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Pelican Compressor Station  
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Hackberry, Cameron Parish, Louisiana**

**I. Background**

Liberty Gas Storage, LLC proposes to construct and operate a salt dome natural gas storage facility and compressor station (SICC 4922), Pelican Compressor Station. In addition, Liberty Gas Storage will construct and operate in-field piping to and from the wells, as well as pipelines to connect the storage facility to the interstate pipeline system. The compressor station is located at 400 Black Lake Road, Hackberry, Louisiana.

This is the initial Part 70 operating permit for the facility.

**II. Origin**

Liberty Gas Storage, LLC submitted a permit application on June 23, 2008 requesting an initial Part 70 operating permit. Additional information dated July 9, 2008 was also received.

**III. Description**

The proposed project will include the conversion of three (3) existing brine caverns located on site to natural gas storage caverns and the development of a fourth natural gas storage cavern in addition to providing compression and dehydration for the four (4) caverns once they become operational. The initial scenario (Phase I) will be temporary as it is associated with development of the fourth natural gas storage cavern and debrining the existing three (3) caverns. The second operational scenario (Phase II) will represent the normal operation of the operational compressor station.

The temporary operating scenario (Phase I) will begin during the solution mining of the salt dome to create a fourth brine cavern. All pumping equipment associated with the solution mining and brine disposal operations will be electric. The solution mining operation is expected to start by using the limited electric service provided at the site by the local utility; however, supplemental electric generation will be required to solution mine at the optimum rate and debrine caverns 1, 2, and 3. Two (2) natural gas fired Caterpillar G3516B LE generator sets, rated at 1818 kW each (EQT015 and 016), will be installed to provide electrical power.

Also during the temporary operating scenario (Phase I), the three (3) existing brine caverns will be converted to natural gas storage caverns by displacing the brine within each cavern with natural gas. When the development of the fourth cavern is completed it will also require debrining. Debrining will be accomplished with the continued use of electric pumps partially powered by the natural gas-fired generators and the introduction of four (4) Caterpillar (CAT) G3616 natural gas-fired compressor engines (EQT001 – 004) to inject natural gas into the

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caverns for the conversion from brine caverns to natural gas storage caverns. The CAT G3616 compressor engines will each be equipped with a catalytic converter to control emissions of carbon monoxide (CO), volatile organic compounds (VOC), and formaldehyde. Emissions sources operational during the temporary operating scenario include the two (2) natural gas-fired generators (EQT015 and 016) with associated lube oil tanks, up to three (3) CAT G3616 natural gas-fired compressor engines operating concurrently, a triethylene glycol dehydration unit (EQT008 and EQT009), a temporary 21,000 gallon diesel blanket tank (EQT014), and several associated storage tanks.

At the completion of the temporary operating scenario, the diesel blanket tank will be removed (EQT014), the two (2) gas-fired generators (EQT015 and 016) will be converted to the two (2) emergency generators EQT006 and EQT007. In addition, a diesel emergency generator (EQT005) will begin standby service and the Pelican Compressor Station will begin normal operation. The temporary operating scenario is anticipated to last approximately 36 months.

The normal operating scenario (or normal operations, Phase II) for the Pelican Compressor Station will consist of four (4) CAT G3616 natural gas-fired compressor engines (EQT001 – 004) operating concurrently, each equipped with a catalytic converter, a triethylene glycol dehydration system (EQT008 and EQT009) controlled with a condenser (EQT009) and combustion device (EQT008), two (2) natural gas-fired emergency generators (EQT006 and 007), a diesel-fired emergency generator (EQT005), and several storage tanks.

The normal and ongoing operation at the Pelican Compressor Station (Phase II) will consist of injection and withdrawal of natural gas from the storage caverns as market demands dictate. The compression required for injection and withdrawal of natural gas will be provided by four (4) CAT G3616, natural gas-fired reciprocating engine-driven compressors (EQT001 – 004). The emissions from the compressor units will each be controlled with a catalytic converter and will be housed in a fully enclosed acoustically designed building to limit the noise impact to the surrounding area.

Natural gas, when withdrawn from the storage caverns, will be dehydrated by contact using triethylene glycol in a 500 MM scf/day glycol dehydration system. The dehydration system will consist of a still column, a flash tank, a reboiler, and a condenser. In this system the natural gas comes in contact with the glycol via a gas/glycol contact tower equipped with structured packing. The water in the gas adheres to the glycol and the resulting glycol-water mixture is sent to the flash tank. The flash gas from the flash tank is routed to the reboiler (EQT008) for use as a supplemental fuel. The glycol-water mixture is then heated in the still column (EQT009) to vaporize the water and regenerate the glycol for reuse. The still column emissions will be controlled by the condenser with the un-condensable vapors then routed to the reboiler for incineration. Dehydrated gas will then be put into the pipeline system for transmission and

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distribution.

Compressor engines CNG-01 through CNG-04 are 4735 horsepower reciprocating engines operated a total of 26,280 hours per year based on a rolling average.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Phase I (Construction)</u> <u>Proposed</u>	<u>Phase II (Operation)</u> <u>Proposed</u>
PM <sub>10</sub>	0.10	0.66
SO <sub>2</sub>	0.32	0.86
NO <sub>x</sub>	132.00	138.69
CO	126.29	53.34
VOC *	68.36	56.70

**\*VOC LAC 33:III.Chapter 51 Toxic Air Pollutants  
(TAPs):**

Pollutant	Phase I (Construction) Proposed	Phase II (Operation) Proposed
Benzene	3.55	3.55
Ethyl benzene	0.09	0.09
Formaldehyde	9.56	5.18
Methanol	0.17	0.17
Toluene	1.50	1.50
Xylene (mixed isomers)	0.39	0.39
n-Hexane	0.27	0.27
Total	15.53	11.15
Other VOC (TPY):	52.83	45.55

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**IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Compliance Assurance Monitoring (CAM), Prevention of Significant Deterioration (PSD) and Non-attainment New Source Review (NNSR) do not apply.

This facility is a minor source of LAC 33:III, Chapter 51 Toxic Air Pollutants (TAPs).

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 2008; and in *The Cameron Parish Pilot*, DeQuincy, on <date>, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>, 2008. The draft permit was also submitted to US EPA Region VI on <date>, 2008. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Emissions associated with the proposed Pelican Compressor Station were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

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Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
-	-	-	-
-	-	-	-

**VIII. General Condition XVII Activities**

Work Activity	Schedule	Emission Rates - tons			
		PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO
Engine Maintenance and Repair CNG-01 blowdowns	24 events/yr				0.10
Engine Maintenance and Repair – CNG-02 blowdowns	24 events/yr				0.10
Engine Maintenance and Repair – CNG-03 blowdowns	24 events/yr				0.10
Engine Maintenance and Repair – CNG-04 blowdowns	24 events/yr				0.10

**IX. Insignificant Activities**

ID No.:	Description	Physical/Operating Data	Citation
T-1	Glycol Storage Tank	1000 gal/glycol	LAC 33:III.501.B.5.A.3
T-3	Lube Oil Storage Tank	4200 gal/lube oil	LAC 33:III.501.B.5.A.3
T-4A	Lube Oil Day Tank A	200 gal/lube oil	LAC 33:III.501.B.5.A.3
T-4B	Lube Oil Day Tank B	200 gal/lube oil	LAC 33:III.501.B.5.A.3
T-4C	Lube Oil Day Tank C	200 gal/lube oil	LAC 33:III.501.B.5.A.3
T-4D	Lube Oil Day Tank D	200 gal/lube oil	LAC 33:III.501.B.5.A.3
T-5	Ambitrol Tank	4200 gal/glycol-water mix	LAC 33:III.501.B.5.A.3

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ID No.:	Description	Physical/Operating Data	Citation
T-6	Oily Water Storage Tank	8820 gal/oil-water mix	LAC 33:III.501.B.5.A.3
T-7	Used Oil Storage Tank	8820 gal/oil	LAC 33:III.501.B.5.A.3
T-10	Diesel Day Tank	2400 gal/diesel	LAC 33:III.501.B.5.A.3
T-11	Lubricator Oil Storage Tank	1000 gal/oil	LAC 33:III.501.B.5.A.3
T-12A	Lubricator Oil Storage Tank A	300 gal/oil	LAC 33:III.501.B.5.A.3
T-12B	Lubricator Oil Storage Tank B	300 gal/oil	LAC 33:III.501.B.5.A.3
T-15	Engine Jacket Water Surge Tank (CNG-01)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-16	Engine Turbo Auxiliary Water Surge Tank (CNG-01)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-17	Engine Jacket Water Surge Tank (CNG-02)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-18	Engine Turbo Auxiliary Water Surge Tank (CNG-02)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-19	Engine Jacket Water Surge Tank (CNG-03)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-20	Engine Turbo Auxiliary Water Surge Tank (CNG-03)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-21	Engine Jacket Water Surge Tank (CNG-04)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2
T-22	Engine Turbo Auxiliary Water Surge Tank (CNG-04)	100 gal/ambitrol-water mix	LAC 33:III.501.B.5.A.2

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	LAC 33:III.Chapter																	
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53*	56
UNF003	Entire Facility	1	1	1	1					1						3		3	
EQT001	CNG-01 – Compressor #1					1	1												
EQT002	CNG-02 – Compressor #2					1	1												
EQT003	CNG-03 – Compressor #3					1	1												
EQT004	CNG-04 – Compressor #4					1	1												
EQT005	G-01 – Emergency Generator					1	1												
EQT006	G-02 – Auxiliary Generator 1					1	1												
EQT007	G-03 – Auxiliary Generator 2					1	1												
EQT008	DEHY-1 – Glycol Dehydrator Reboiler					1	1								1				
EQT009	COND-1 – Glycol Dehydrator Still Column/Condenser														1				
EQT010	T-8 – Methanol Storage Tank																		
EQT011	T-9 – Diesel Storage Tank A																		
EQT012	T-14 – Diesel Storage Tank B																		
EQT013	TL-01 – Truck Loading																		
EQT014	T-23 – Diesel Blanket Tank																		
EQT015	G-02Alt – Auxiliary Generator 1 Alt														1	1			

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ID No.:	Description	LAC 33:III.Chapter																	
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53*	56
EQT016	G-03Alt – Auxiliary Generator 2Alt				1	1													
EQT018	T-2 – Condensate Storage Tank																		
FUG001	F-01 – Fugitive Equipment Leaks														1				

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

		40 CFR 60												40 CFR 61												40 CFR			
		A	K	Ka	Kb	Db	Dc	GG	III	JJJ	A	J	V	A	HH	HHH	VV	ZZZZ	64	68	82								
UNF003	Entire Facility	1												1		3			3	3	1								
EQT001	CNG-01 – Compressor #1													1							1								
EQT002	CNG-02 – Compressor #2													1							1								
EQT003	CNG-03 – Compressor #3													1							1								
EQT004	CNG-04 – Compressor #4													1							1								
EQT005	G-01 – Emergency Generator													1							1								
EQT006	G-02 – Auxiliary Generator 1													1							1								
EQT007	G-03 – Auxiliary Generator 2													1							1								
EQT008	DEHY-1 – Glycol Dehydrator Reboiler																												
EQT009	COND-1 – Glycol Dehydrator Condenser																												
EQT010	T-8 – Methanol Storage Tank													3															
EQT011	T-9 – Diesel Storage Tank A													3															
EQT012	T-14 – Diesel Storage Tank B													3															
EQT013	TL-01 – Truck Loading																												
EQT014	T-23 – Diesel Blanket Tank													3															
EQT015	G-02Alt – Auxiliary Generator 1Alt																				1								
EQT016	G-03Alt – Auxiliary Generator 2Alt																				1								

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY****Pelican Compressor Station****Agency Interest No: 158683****Liberty Gas Storage LLC****Hackberry, Cameron Parish, Louisiana****X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

		40 CFR 60						40 CFR 61						40 CFR 63						
		A	K	Ka	Kb	Db	Dc	GG	III	JJJ	A	J	V	A	HHH	VV	ZZZZ	64	68	82
EQT018	T-2 – Condensate Storage Tank				3															
FUG001	F-01 – Fugitive Equipment Leaks																			

**KEY TO MATRIX**

- 1 - The regulations have applicable requirements that apply to this particular emission source.  
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
UNF003 Entire Facility	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.Chapter 51  National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities 40 CFR 63 Subpart HHH  Compliance Assurance Monitoring (CAM) 40 CFR Part 64	DOES NOT APPLY - The Pelican Compressor Station is not a major source of hazardous air pollutants, as defined in LAC 33:III.5103.
		DOES NOT APPLY - The Pelican Compressor Station is a minor source of hazardous air pollutants.
		DOES NOT APPLY - Emission units at the Pelican Compressor Station are not equipped with an add-on control device to achieve compliance with an emission limitation or standard.
		DOES NOT APPLY - Per LAC 33:III.5907, facility does not produce, process, handle, or store any substance listed in 40 CFR 68.130 or Tables 59.0 and 59.1 of Chapter 59 in an amount greater than the threshold quantity.
	Chemical Accident Prevention Provisions 40 CFR 68  Chemical Accident Prevention and Minimization of Consequences LAC 33:III.Chapter 59	DOES NOT APPLY - Per LAC 33:III.5907, facility does not produce, process, handle, or store any substance listed in 40 CFR 68.130 or Tables 59.0 and 59.1 of Chapter 59 in an amount greater than the threshold quantity.
EQT010 T-8 – Methanol Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Capacity is < 37.85 m <sup>3</sup> (10,000 gal) and vapor pressure < 3.45 kPa (0.5 psia).
EQT011, 012, and 014 T-9, T-14, and T-23 Diesel Tanks	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Capacity is < 37.85 m <sup>3</sup> (10,000 gal) and vapor pressure < 3.45 kPa (0.5 psia).

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The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

## 40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.  
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

## 40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
  1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;

## 40 CFR PART 70 GENERAL CONDITIONS

4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33.III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

## 40 CFR PART 70 GENERAL CONDITIONS

- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application dated June 23, 2008, along with supplemental information dated July 9, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.  
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September
    - 4. Report by March 31 to cover October through December
  - D. Each report submitted in accordance with this condition shall contain the following information:
    - 1. Description of noncomplying emission(s);
    - 2. Cause of noncompliance;
    - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
    - 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
    - 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
  - E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1586683 Liberty Gas Storage LLC - Pelican Compressor Station

Activity Number: PER20080001

Permit Number: 0560-00268-V0

Air - Title V Regular Permit Initial

Also Known As:	ID	Name	User Group	Start Date
	0560-00268	Liberty Gas Storage LLC - Pelican Compressor Station	CDS Number	06-25-2008
Physical Location:				
Mailing Address:				
Location of Front Gate:				
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Hugh Berglund	2100 W Burton St Sulphur, LA 70663	3375272255 (WP)	Employed by
	Arturo Infarzon	101 Ash St San Diego, CA 92101	6196562348 (WP)	Responsible Official for
	Marilyn Teague	101 Ash St San Diego, CA 92101	7144737749 (WP)	Air Permit Contact For
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Liberty Gas Storage LLC	2100 W Burton St Sulphur, LA 70663	3375272255 (WP)	Air Billing Party for
	Liberty Gas Storage LLC	2100 W Burton St Sulphur, LA 70663	3375272255 (WP)	Operates
	Liberty Gas Storage LLC	2100 W Burton St Sulphur, LA 70663	3375272255 (WP)	Owns
NAIC Codes:	4862, Pipeline Transportation of Natural Gas			

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 218-0775 or email your changes to facupdate@la.gov.

**INVENTORIES**  
**All ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station**  
**Activity Number: PER20080001**  
**Permit Number: 0560-00268-V0**  
**Air - Title V Regular Permit Initial**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Entire Facility</b>						
EQT0001	CNG-01 - Compressor #1			4735 horsepower		8760 hr/yr (All Year)
EQT0002	CNG-02 - Compressor #2			4735 horsepower		8760 hr/yr (All Year)
EQT0003	CNG-03 - Compressor #3			4735 horsepower		8760 hr/yr (All Year)
EQT0004	CNG-04 - Compressor #4			4735 horsepower		8760 hr/yr (All Year)
EQT0005	G-01 - Emergency Generator			1005 horsepower		500 hr/yr (All Year)
EQT0006	G-02 - Auxiliary Generator 1			1818 horsepower		500 hr/yr (All Year)
EQT0007	G-03 - Auxiliary Generator 2			1818 horsepower		500 hr/yr (All Year)
EQT0008	DEHY-1 - Glycol Dehydrator Reboiler			2 MM BTU/hr		8760 hr/yr (All Year)
EQT0009	COND-1 - Glycol Dehydrator Still Column/Condenser					8760 hr/yr (All Year)
EQT0010	T-8 - Methanol Storage Tank	8820 gallons				8760 hr/yr (All Year)
EQT0011	T-9 - Diesel Storage Tank A	21000 gallons				8760 hr/yr (All Year)
EQT0012	T-14 - Diesel Storage Tank B	21000 gallons				8760 hr/yr (All Year)
EQT0013	TL-01 - Truck Loading			181000 gallons/yr		22 hr/yr (All Year)
EQT0014	T-23 - Diesel Blanket Tank	21000 gallons				At the completion of the fourth cavern, the diesel blanket tank will be removed.
EQT0015	G-02Alt - Auxiliary Generator 1Alt			1818 horsepower		At the completion of the fourth cavern, this emission source will be removed.
EQT0016	G-03Alt - Auxiliary Generator 2Alt			1818 horsepower		At the completion of the fourth cavern, this emission source will be removed.
EQT0017	GR-FT - Glycol Regenerator Flash Tank					8760 hr/yr (All Year)
EQT0018	T-2 - Condensate Storage Tank	8820 gallons				8760 hr/yr (All Year)
FUG0001	F-01 - Fugitive Equipment Leaks					8760 hr/yr (All Year)
<b>Stack Information:</b>						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
<b>Entire Facility</b>						
EQT0001	CNG-01 - Compressor #1	107.72	34725	2.5		52
EQT0002	CNG-02 - Compressor #2	107.72	31725	2.5		52
EQT0003	CNG-03 - Compressor #3	107.72	31725	2.5		52
EQT0004	CNG-04 - Compressor #4	107.72	31725	2.5		52
EQT0005	G-01 - Emergency Generator	105	8756	1.33		23
EQT0006	G-02 - Auxiliary Generator 1	973.52	11469	.5		15
EQT0007	G-03 - Auxiliary Generator 2	973.52	11469	.5		15
EQT0008	DEHY-1 - Glycol Dehydrator Reboiler	9	1183	1.67		23
EQT0010	T-8 - Methanol Storage Tank					15

INVENTORIES

All ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
 Activity Number: PER20080001  
 Permit Number: 0560-0-0268-V0  
 Air - Title V Regular Permit Initial

Stack Information:		Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
<b>Entire Facility</b>								
EQT0011	T-9 - Diesel Storage Tank A				.33		25	
EQT0012	T-14 - Diesel Storage Tank B				.33		25	
EQT0014	T-23 - Diesel Blanket Tank				.33		25	
EQT0015	G-02Alt - Auxiliary Generator 1Alt		973.52	11469	5		15	986
EQT0016	G-03Alt - Auxiliary Generator 2Alt		973.52	11469	5		15	986
EQT0017	GR-FIT - Glycol Regenerator Flash Tank			25.9			120	
EQT0018	T-2 - Condensate Storage Tank							

## Relationships:

ID	Description	Relationship	ID	Description
EOT009	COND-1 - Glycol Dehydrator Still Column/Condenser	Controlled by	EQT0008	DEHY-1 - Glycol Dehydrator Reboiler
EOT0017	GR-FIT - Glycol Regenerator Flash Tank	Controlled by	EQT0008	DEHY-1 - Glycol Dehydrator Reboiler

## Subject Item Groups:

ID	Group Type	Group Description
CRG0001	Common Requirements Group	CRG001 - Compressor Engines #1, #2, #3, and #4
CRG0002	Common Requirements Group	CRG002 - G-02 and G-03
CRG0003	Common Requirements Group	CRG003 - G-02-Alt and G-03-Alt
UNF0001	Unit or Facility Wide	UNF001 - Entire Facility

## Group Membership:

ID	Description	Member of Groups
EOT0001	CNG-01 - Compressor #1	CRG000000000001
EOT0002	CNG-02 - Compressor #2	CRG000000000001
EOT0003	CNG-03 - Compressor #3	CRG000000000001
EOT0004	CNG-04 - Compressor #4	CRG000000000001
EOT0006	G-02 - Auxiliary Generator 1	CRG000000000002
EOT0007	G-03 - Auxiliary Generator 2	CRG000000000002
EOT0015	G-02Alt - Auxiliary Generator 1Alt	CRG000000000003
EOT0016	G-03Alt - Auxiliary Generator 2Alt	CRG000000000003

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

## Annual Maintenance Fee:

SIC Codes	Natural gas transmission	All 158683
4922		

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
 Activity Number: PER20080001  
 Permit Number: 0560-00268-V0  
 Air - Title V Regular Permit Initial

**Phase I**

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
<b>Entire Facility</b>															
CRG 0001	7.83	34.29	21.92				96.02	0.01	0.03	0.06		0.25	6.58		28.81
CNG01		3.13			8.77				0.003			0.02			2.63
EQT 0001												0.003			2.63
CNG-01		3.13			8.77							0.02			2.63
EQT 0002												0.003			2.63
CNG-02		3.13			8.77							0.02			2.63
EQT 0003												0.003			2.63
CNG-03		3.13			8.77							0.02			2.63
EQT 0004												0.003			2.63
CNG-04		3.13			8.77							0.02			2.63
EQT 0008	0.17	0.20	0.72		0.20	0.24	0.86	0.02	0.02	0.07	0.02	0.002	0.01	3.28	3.93
DERV-1															14.35
EQT 0010															0.17
T-3															0.04
EQT 0011															0.002
T-9															0.01
EQT 0012															0.002
T-14															0.01
EQT 0013															0.002
TL-01															0.01
EQT 0014															0.002
T-23															0.01
EQT 0015	10.42	12.51	45.64	4.01	4.81	17.56				0.01	0.01	0.03	2.65	3.17	11.59
G-02AL															
EQT 0016	10.42	12.51	45.64	4.01	4.81	17.56				0.01	0.01	0.03	2.65	3.17	11.59
G-03AL															
FUG 0001													0.41	0.49	1.79
F-01															

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
 Activity Number: PER20080001  
 Permit Number: 0560-002668-V0  
 Air - Title V Regular Permit Initial

**Phase II**

Subject Item	CO			NOx			PM10			SO2			VOC			
	Avg lb/hr	Max lb/hr	Tons/Year													
<b>Entire Facility</b>																
EQT 0001 CNG-01	2.61	3.13	11.43	7.31	8.77	32.01	0.002	0.003	0.01	0.02	0.08	2.19	2.63	9.60		
EQT 0002 CNG-02	2.61	3.13	11.43	7.31	8.77	32.01	0.002	0.003	0.01	0.02	0.08	2.19	2.63	9.60		
EQT 0003 CNG-03	2.61	3.13	11.43	7.31	8.77	32.01	0.002	0.003	0.01	0.02	0.08	2.19	2.63	9.60		
EQT 0004 CNG-04	2.61	3.13	11.43	7.31	8.77	32.01	0.002	0.003	0.01	0.02	0.08	2.19	2.63	9.60		
EQT 0005 G-01	6.71	8.06	1.68	31.16	37.39	7.79	2.21	2.65	0.55	2.06	2.47	0.52	2.48	2.98	0.62	
EQT 0006 G-02	10.42	12.51	2.61	4.01	4.81	1.00			0.01	0.01	0.03	2.65	3.17	0.66		
EQT 0007 G-03	10.42	12.51	2.61	4.01	4.81	1.00			0.01	0.01	0.03	2.65	3.17	0.66		
EQT 0008 DEM-1	0.17	0.20	0.72	0.20	0.24	0.86	0.02	0.02	0.07	0.002	0.002	0.01	3.28	3.93	14.35	
EQT 0010 T-4													0.04	0.05	0.17	
EQT 0011 T-9													0.002	0.002	0.01	
EQT 0012 T-14													0.002	0.002	0.01	
EQT 0013 T-01													2.73	2.87	0.03	
FUG 0001 F-01													0.41	0.49	1.79	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
 Activity Number: PER20080001  
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 Air - Title V Regular Permit Initial

**Phase II**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 CNG-01	Formaldehyde	0.28	0.33	1.21
EQT 0002 CNG-02	Formaldehyde	0.28	0.33	1.21
EQT 0003 CNG-03	Formaldehyde	0.28	0.33	1.21
EQT 0004 CNG-04	Formaldehyde	0.28	0.33	1.21
EQT 0005 G-01	Formaldehyde	0.01	0.01	0.002
EQT 0006 G-02	Formaldehyde	0.68	0.81	0.17
EQT 0007 G-03	Formaldehyde	0.68	0.81	0.17
EQT 0008 DEHY-1	Benzene	0.80	0.96	3.49
	Ethyl benzene	0.02	0.03	0.09
	Formaldehyde	< 0.001	< 0.001	0.001
	Toluene	0.33	0.40	1.46
	Xylene (mixed isomers)	0.08	0.10	0.37
	n-Hexane	0.06	0.07	0.24
EQT 0010 T-8	Methanol	0.04	0.05	0.17
FUG 0001 F-01	Benzene	0.01	0.02	0.06
	Ethyl benzene	0.001	0.001	0.003
	Toluene	0.01	0.01	0.04
	Xylene (mixed isomers)	0.004	0.005	0.02
	n-Hexane	0.01	0.01	0.03
UNF 0001 UNF001	Benzene			3.55
	Ethyl benzene			0.09
	Formaldehyde			5.18
	Methanol			0.17
	Toluene			1.50
	Xylene (mixed isomers)			0.39
	n-Hexane			0.27

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
 Activity Number: PER20080001  
 Permit Number: 0560-00268-V0  
 Air - Title V Regular Permit Initial

**Phase I**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CRG 0001 CRG001	Formaldehyde	0.83		3.62
EOT 0001 CNG-01	Formaldehyde		0.33	
EOT 0002 CNG-02	Formaldehyde		0.33	
EOT 0003 CNG-03	Formaldehyde		0.33	
EOT 0004 CNG-04	Formaldehyde		0.33	
EOT 0008 DEHY-1	Benzene	0.80	0.96	3.49
	Ethyl benzene	0.02	0.03	0.09
	Formaldehyde	< 0.001	< 0.001	0.001
	Toluene	0.33	0.40	1.46
	Xylene (mixed isomers)	0.08	0.10	0.37
	n-Hexane	0.06	0.07	0.24
EOT 0010 T-8	Methanol	0.04	0.05	0.17
EOT 0015 G-02Ai	Formaldehyde	0.68	0.81	2.97
EOT 0016 G-03Ai	Formaldehyde	0.66	0.81	2.97
FUG 0001 F-01	Benzene	0.01	0.02	0.06
	Ethyl benzene	0.001	0.001	0.003
	Toluene	0.01	0.01	0.04
	Xylene (mixed isomers)	0.004	0.005	0.02
	n-Hexane	0.01	0.01	0.03
UNF 0001 UNF001	Benzene			3.55
	Ethyl benzene			0.09
	Formaldehyde			9.56
	Methanol			0.17
	Toluene			1.50
	Xylene (mixed isomers)			0.39
	n-Hexane			0.27

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

**SPECIFIC REQUIREMENTS**

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**CRG0001 Compressor Engines #1, #2, #3, and #4**

Group Members: EQT0001 EQT0002 EQT0003 EQT0004

- 1 [40 CFR 60.4245(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 60.4245(a)(1), (2) and (4). Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(a)]  
 Submit an initial notification as required in 40 CFR 60.7(a)(1) to the Office of Environmental Compliance. The notification must include the information specified in 40 CFR 60.4245(c)(1) through (5). Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(c)]  
 Submit a copy of each performance test as required in 40 CFR 60.4244 to the Office of Environmental Compliance within 60 days after the test has been completed. Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(d)]  
 Permittee shall demonstrate compliance with 40 CFR 63 Subpart ZZZZ by complying with the appropriate requirements specified in 40 CFR 60 Subpart JJJ. Phases: Phase II. [40 CFR 63.6590(c)]  
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Phases: Phase II. [LAC 33:III.1311.C, LAC 33:III.1101.B]  
 Which Months: All Year Statistical Basis: Six-minute average  
 Equipment/operational data monitored by technically sound method continuously.  
 Which Months: All Year Statistical Basis: None specified  
 Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total hours of operation of the four (4) generators (CNG-01 through CNG-04) and the corresponding calculated emissions of criteria pollutants (PM10, SO2, NOx, CO, and VOC) based on the emission factors each month, as well as the total corresponding criteria pollutants for the last twelve months. Make records available for inspection by LDEQ personnel.  
 The total annual hours of operation of the generators Equipment/operational data <= 26280 hr/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total combined operating time for both generators exceeds the maximum listed in this specific condition for any twelve consecutive month period.  
 Which Months: Phases: Statistical Basis: Twelve-month rolling average (rolling 1-month basis)
- 2 [40 CFR 60.4245(c)]  
 3 [40 CFR 60.4245(d)]  
 4 [40 CFR 63.6590(c)]  
 5 [LAC 33:III.1311.C]  
 6 [LAC 33:III.501.C.6]  
 7 [LAC 33:III.501.C.6]  
 8 [LAC 33:III.501.C.6]
- 9 [40 CFR 60.4245(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 60.4245(a)(1), (2) and (4). Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(a)]  
 Submit an initial notification as required in 40 CFR 60.7(a)(1) to the Office of Environmental Compliance. The notification must include the information specified in 40 CFR 60.4245(c)(1) through (5). Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(c)]  
 Submit a copy of each performance test as required in 40 CFR 60.4244 to the Office of Environmental Compliance within 60 days after the test has been completed. Subpart JJJ. Phases: Phase II. [40 CFR 60.4245(d)]  
 Permittee shall demonstrate compliance with 40 CFR 63 Subpart ZZZZ by complying with the appropriate requirements specified in 40 CFR 60 Subpart JJJ. Phases: Phase II. [40 CFR 63.6590(c)]  
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Phases: Phase II. [LAC 33:III.1311.C, LAC 33:III.1101.B]  
 Which Months: All Year Statistical Basis: Six-minute average

**CRG0002 G-02 and G-03**

Group Members: EQT0006 EQT0007

- 9 [40 CFR 60.4245(a)]  
 10 [40 CFR 60.4245(c)]  
 11 [40 CFR 60.4245(d)]  
 12 [40 CFR 63.6590(c)]  
 13 [LAC 33:III.1311.C]

**SPECIFIC REQUIREMENTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
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**Air - Title V Regular Permit Initial**

**CRG0003 G-02-Alt and G-03-Alt**

Group Members: EQT0015 EQT0016

- 14 [40 CFR 60.4245(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 60.4245(a)(1), (2) and (4). Subpart JJJ. Phases: Phase I. [40 CFR 60.4245(a)]
  - 15 [40 CFR 60.4245(c)] Submit an initial notification as required in 40 CFR 60.7(a)(1) to the Office of Environmental Compliance. The notification must include the information specified in 40 CFR 60.4245(c)(1) through (5). Subpart JJJ. Phases: Phase I. [40 CFR 60.4245(c)]
  - 16 [40 CFR 60.4245(d)] Submit a copy of each performance test as required in 40 CFR 60.4244 to the Office of Environmental Compliance within 60 days after the test has been completed. Subpart JJJ. Phases: Phase I. [40 CFR 60.4245(d)]
  - 17 [40 CFR 63.6590(c)] Permittee shall demonstrate compliance with 40 CFR 63 Subpart ZZZZ by complying with the appropriate requirements specified in 40 CFR 60 Subpart JJJ. Phases: Phase I. [40 CFR 63.6590(c)]
  - 18 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Phases: Phase I. [LAC 33:III.1311.C, LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: Six-minute average

**EQT0005 G-01 - Emergency Generator**

- 19 [40 CFR 60.4204(a)] Nitrogen oxides <= 1.6 g/BHP-hr (9.2 g/KW-hr). Subpart IIII. Phases: Phase II. [40 CFR 60.4204(a)]
- 20 [40 CFR 60.4204(a)] Which Months: All Year Statistical Basis: None specified Particulate matter (10 microns or less) <= 0.15 g/BHP-hr (0.54 g/KW-hr). Subpart IIII. Phases: Phase II. [40 CFR 60.4204(a)]
- 21 [40 CFR 60.4205(b)] Which Months: All Year Statistical Basis: None specified Limit emissions to equal to or less than emissions listed in 40 CFR 89.112 Table 1. 40 CFR 60 Subpart IIII. Phases: Phase II. [40 CFR 60.4205(b)]
- 22 [40 CFR 60.4206] Operate and maintain stationary CI ICE according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. Subpart IIII. Phases: Phase II.
- 23 [40 CFR 60.4207(a)] Beginning October 1, 2007, use diesel fuel that meets the requirements of 40 CFR 80.510(a). Subpart IIII. Phases: Phase II. [40 CFR 60.4207(a)]
- 24 [40 CFR 60.4207(b)] Beginning October 1, 2010, use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. Subpart IIII. Phases: Phase II. [40 CFR 60.4207(b)]
- 25 [40 CFR 60.4209(a)] Install a non-resettable hour meter prior to startup of the engine. 40 CFR 60 Subpart IIII Phases: Phase II. [40 CFR 60.4209(a)]
- 26 [40 CFR 60.4211(a)] Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, only change those settings that are permitted by the manufacturer. Also meet the requirements of 40 CFR 89.94 and/or 1068, as applicable. Subpart IIII. Phases: Phase II. [40 CFR 60.4211(a)]
- 27 [40 CFR 60.4211(a)] Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. Meet prescribed engine specifications. Operate 100 hours per year or less for testing procedures. 40 CFR 60 Subpart IIII. Phases: Phase II. [40 CFR 60.4211(a), 40 CFR 60.4211(e)]
- 28 [40 CFR 60.4211(b)] Demonstrate compliance according to the method specified in 40 CFR 60.4211(b). Subpart IIII. Phases: Phase II. [40 CFR 60.4211(b)]

**SPECIFIC REQUIREMENTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
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**EQT0005 G-01 - Emergency Generator**

- 29 [40 CFR 60.4214(b)] Keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter.  
 The owner must record the time of operation of the engine and the reason the engine was in operation during that time. 40 CFR 60 Subpart III.  
 Phases: Phase II. [40 CFR 60.4214(b)]  
 Permittee shall demonstrate compliance with 40 CFR 63 Subpart ZZZZ by complying with the appropriate requirements specified in 40 CFR 60 Subpart III. Phases: Phase II. [40 CFR 63.6590(c)]
- 30 [40 CFR 63.6590(c)] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Phases: Phase II. [LAC 33:III.1311.C, LAC 33:III.1101.B]
- 31 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: Six-minute average

**EQT0008 DEHY-1 - Glycol Dehydrator Reboiler**

- 32 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Phases: Phase II.  
 Which Months: All Year Statistical Basis: None specified  
 VOC, Total >= 85 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. Phases:  
 Phase II.  
 Which Months: All Year Statistical Basis: None specified
- 33 [LAC 33:III.2116.B.2] VOC, Total >= 85 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. Phases:  
 Phase II.

**EQT0009 COND-1 - Glycol Dehydrator Still Column/Condenser**

- 34 [LAC 33:III.2116.B.2] Which Months: All Year Statistical Basis: None specified  
 Determine compliance with LAC 33:III.2116.B using the methods in LAC 33:III.2116.D.1-f, as appropriate. Phases: Phase II.  
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2116.F.1. Phases: Phase II.
- 35 [LAC 33:III.2116.D]  
 36 [LAC 33:III.2116.F.1]

**EQT0010 T-8 - Methanol Storage Tank**

- 37 [LAC 33:III.2103.A] Equip with a submerged fill pipe. Phases: Phase II.  
 38 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3-a-e. Phases: Phase II.  
 39 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. Phases: Phase II.

**FUG0001 F-01 - Fugitive Equipment Leaks**

**SPECIFIC REQUIREMENTS**

AI ID: 158683 - Liberty Gas Storage LLC - Pelican Compressor Station  
**Activity Number:** PER20080001  
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**FUG0001 F-01 - Fugitive Equipment Leaks**

40 [LAC 33:III.2111]

Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment. Phases: Phase II.

**UNF0001 Entire Facility**

- 41 [40 CFR 60.4233(e)]
- 42 [40 CFR 63.]
- 43 [40 CFR 70.5(a)(1)(iii)]
- 44 [40 CFR 70.6(a)(3)(ii)(A)]
- 45 [40 CFR 70.6(a)(3)(ii)(B)]
- 46 [40 CFR 70.6(c)(5)(iv)]
- 47 [40 CFR 82 Subpart F]
- 48 [LAC 33:III.1103]
- 49 [LAC 33:III.1109.B]
- 50 [LAC 33:III.1303.B]
- 51 [LAC 33:III.2113.A]
- 52 [LAC 33:III.219]
- 53 [LAC 33:III.2901.D]

Shall comply with all applicable provisions in 40 CFR 60 Subpart IIIJ, Table 1. [40 CFR 60.4233(e)]

All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.

Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]

Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(ii)(A)]

Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(ii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(ii)(B)]

Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]  
 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.

Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.  
 Outdoor burning of waste material or other combustible material is prohibited.

Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.  
 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.

Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.  
 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butano scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.

**SPECIFIC REQUIREMENTS**

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**UNF0001 Entire Facility**

- 54 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 55 [LAC 33:III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5.
- 56 [LAC 33:III.507.A.1.a] Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the procedures in LAC 33:III Chapter 5.
- 57 [LAC 33:III.507.E.4] Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.
- 58 [LAC 33:III.507.G.5] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 59 [LAC 33:III.517.B.1] Alternate Operating Scenario: Operating plan recordkeeping by logbook upon each occurrence of making a change from one operating scenario to another. Record the operating scenario under which the facility is currently operating. Include in this record the identity of the sources involved, the permit number under which the scenario is included, and the date of change. Keep a copy of the log on site for at least two years.
- 60 [LAC 33:III.517.C] Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.
- 61 [LAC 33:III.517.D] Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.
- 62 [LAC 33:III.517.E] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.
- 63 [LAC 33:III.517.G] In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.
- 64 [LAC 33:III.521.A] Submit change of ownership notification in accordance with LAC 33:1.Chapter 19.
- 65 [LAC 33:III.5611.A] Submit permit modification application: Due within 45 days of obtaining relevant test results. The permit modification or amendment shall include all information necessary to process the request, and is required if testing demonstrates that the terms and conditions of the existing permit are inappropriate or inaccurate.
- 66 [LAC 33:III.5611.B] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 67 [LAC 33:III.5911.A] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 68 [LAC 33:III.5911.C] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Office of Environmental Compliance.
- 69 [LAC 33:III.5911.D] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

**SPECIFIC REQUIREMENTS**

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**UNF0001 Entire Facility**

69 [LAC 33.III.919.D]

Submit Emission Inventory (E) / Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33.III.919.A-D.